

REMARKS

Entry of this amendment, reconsideration and withdrawal of all grounds of rejection, and allowance of all the pending claims are respectfully requested in light of the above amendments and the following remarks. Claims 1-25, as shown above, remain pending herein.

Claims 1-25 stand rejected under 35 U.S.C. §112, first paragraph. Applicants respectfully traverse this ground of rejection.

Applicants have amended claims 1, 12, 23, 24 and 25 to recite in part that the removable card has a processor for running an application that is separate from an application on the host processor, and an agent program is downloadable from the removable card to the host device, such that the agent program runs on a processor of the host device and controls communication between the separate application on the removable card and the separate application on the host device. The specification provides support at least at page 6, lines 3-8. The invention permits a removable card and a host device to communicate without the problems associated with conventional card-host communication techniques by, for example, eliminating the need to standardize data descriptors and/or structures between the cards and the host.

Applicants respectfully submit that at least Fig. 1 and a description thereof in the specification from page 8, line 20 to page 9, line 21, which describes in part how an application 20-1 on the host 14 and an application 16-1 (and/or 16-2) on the removable card 12 communicate via the agents 18-1 and 18-2. The specification at page 10 lines 12-14 discloses that the agents can use standardized applicant programming interfaces

(APIs). Thus, Applicants respectfully submit that a person of ordinary skill in the art would find the above-recited claim language to be enabling so as to practice the invention.

Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 1-25 stand rejected under 35 U.S.C. §103(a) over the combination of Mankovitz (U.S. 5,949,492) in view of Martino (U.S. 6,044,382). Applicants respectfully traverse this ground of rejection.

Applicants respectfully disagree that the combination of Mankovitz and Martino provide any disclosure, suggestion, or motivation such that any of the instant claims would have been obvious to a person of ordinary skill in the art at the time of invention. The combination fails to disclose or suggest a card-host system with a removable card in which each of the card and host have respective processors, and wherein both the card and the host run separate applications that are able to communicate via an agent program.

Applicants also respectfully submit that there is no incentive or suggestion found in the references to combine them. The Final Office Action is incorrectly using the claimed invention as a blueprint to forge an impermissible degree of hindsight by alleging that it would have been obvious to modify Mankovitz in view of Martino to include an application independent of the host device.

Furthermore, the alleged combination of Mankovitz and Martino fails to disclose or suggest a downloadable agent that is used to permit two separate applications from communicating. As previously mentioned above, the presently claimed invention permits the host and removable card to utilize non-standardized data descriptors. The presently

claimed invention, by such a structure in one possible application of the many varied applications of the claimed invention, reduces and deters theft of service as the removable card can be encrypted to a larger degree than known heretofore in card-host systems, as the details of the communication protocol carried out between the agents and the removable card can be private, i.e., known only to the card and its agents (please see specification at page 10, lines 18-22).

For at least the above reasons, Applicants respectfully submit that none of the instant claims would have been obvious to a person of ordinary skill in the art in view of the combination of Mankovitz and Martino.

Reconsideration and withdrawal of this ground of rejection are respectfully requested.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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